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February 13, 2020

Honorable Richard M. Berman
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 17B
New York, NY 10007

MEMO ENDORSED

Re: *U.S.A. v. Klein*, 1:18-cr-00711-RMB

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: **2/14/2020**

Dear Hon. Judge Berman:

I write to request permission for Mr. Klein to travel for two upcoming trips with his family—one this weekend, and another in April.

Mr. Klein has been on pretrial release since his initial appearance before the magistrate court on October 11, 2018. It is a condition of Mr. Klein's pretrial release that he not travel outside the Southern District of New York, the Eastern District of New York, and the District of New Jersey without permission of the Court.

Mr. Klein respectfully seeks permission to travel with his family this weekend to visit colleges with his daughter. Specifically, Mr. Klein would like to visit the University of Maryland and Georgetown University with his family. Mr. Klein and his family would like to leave New York and travel to Maryland on Saturday, February 15th and would return to New York on Tuesday, February 18.

Mr. Klein also respectfully requests permission to take a trip to Florida with his family. He would like to depart New York on April 3rd to travel to Florida and would return to New York on April 8th.

The government does not object to a modification of Mr. Klein's release conditions to accommodate the proposed travel. We contacted Pretrial Services and are awaiting final approval, but we do not expect Pretrial Services to object given the history of this case.

Respectfully submitted,



Alexandra Conlon

cc: (by email)

Application granted.

SO ORDERED:
Date: **2/14/20**


Richard M. Berman, U.S.D.J.

Nicolas Roos
Assistant United States Attorney

Mia Rahman
Pretrial Services